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FEDERAL TRADE COMMISSION  
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9 **UNITED STATES DISTRICT COURT**  
10 **NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

11  
12 FEDERAL TRADE COMMISSION,

13 Plaintiff,

14 v.  
15

NEXTCLICKMEDIA, LLC, *et al.*,

16 Defendants.  
17  
18

Case No. C08-1718-VRW

STIPULATION FOR ORDER  
EXTENDING DEADLINE FOR FILING  
RESPONSIVE PLEADINGS AND  
~~PROPOSED~~ ORDER

20 WHEREAS, Defendants NextClickMedia, LLC's, Next Internet, LLC's, Kenneth  
21 Chan's and Albert Chen's (collectively, "Defendants") response to Plaintiff Federal Trade  
22 Commission's (the "FTC") Complaint is currently due on Monday, December 1, 2008;

23 WHEREAS, the parties to this action have continued to exchange information and  
24 proposed settlement provisions with the intention of exploring the possibility of settlement of  
25 this matter;

26 WHEREAS, the FTC is willing to extend the time for Defendants to file their responses  
27 to Plaintiff's Complaint in order to focus on settlement discussions; and

28 WHEREAS the parties believe that additional time will increase the likelihood that they

1 will be able to reach a settlement of this matter;

2 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the FTC and  
3 Defendants, through their respective counsel, that Defendants' time to move, answer or  
4 otherwise respond to the Complaint shall be and hereby is extended to and including February 2,  
5 2009; and

6 IT IS FURTHER STIPULATED that the Case Management Conference, currently  
7 scheduled for January 22, 2009, at 3:30 p.m., be rescheduled to March 26, 2009, at 3:30 p.m.,  
8 and that the date for filing the Case Management Statement be extended to March 16, 2009.

9

10 Dated: 11/21/08

/s/

11 MICHAEL C. LYNCH  
KELLEY DRYE & WARREN, LLP  
ATTORNEY FOR DEFENDANTS

12 Dated: 11/21/08

/s/

13 JANICE L. CHARTER  
DAVID M. NEWMAN  
THOMAS N. DAHDOUH  
14 ATTORNEYS FOR PLAINTIFF

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17 **ORDER**

18 PURSUANT TO STIPULATION, IT IS SO ORDERED.

19 Dated: 12/1/2008

20 VAUGHN R. WALKER  
UNITED STATES DISTRICT COURT JUDGE

